

## Hafetz Necheles & Rocco

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May 6, 2011

VIA ECF

The Hon. Sterling Johnson, Jr.  
Senior United States District Judge  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, NY 11201

Re: United States v. Lebovitz, et al., No. 11 Crim. 134

Dear Judge Johnson:

I write on behalf of Moses Neuman and Yudah Neuman, defendants in the above-referenced action, to request the Court's approval concerning a minor modification to the Neumans' conditions of release. David Spears of Spears & Imes LLP, who represents Yudah Neuman, has authorized us to make this request on behalf of both defendants and he joins in the request on behalf of Yudah Neuman.

The Neumans have second homes in the Catskills, near Monticello. During the summer months, they travel frequently between Brooklyn and the Catskills. The most efficient route between Brooklyn and the Catskills is through the northeast corner of New Jersey, on Route 4 or the Palisades Parkway.

The Neumans request that their conditions of release, which currently limit travel to the Eastern and Southern Districts of New York, be modified to allow travel through the District of New Jersey for the purpose of travelling between Brooklyn and the Catskills.

I have discussed this proposed modification with Pretrial Services Officer Ignace Sanon-Jules and AUSA Charles Kleinberg, and neither Pretrial Services nor the government has any objection.

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If this proposed modification to the Neumans' bail conditions meets with Your Honor's approval, I request that the Court so-order this letter.

Respectfully submitted,

/s/  
Joshua R. Geller

cc: Pretrial Services Officer Ignace Sanon-Jules  
(*via electronic mail*: ignace\_sanon-jules@nyept.uscourts.gov)  
AUSA Charles Kleinberg (*via ECF*)  
David Spears, Counsel for Yudah Neuman (*via ECF*)